



State of Ohio Environmental Protection Agency

Central District Office

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August 21, 2007

Mr. Mark Roth
American Wood Fibers, Inc.
2500 Owens Road
Circleville, OH 43113

Re: Notice of Violation based upon the July 16, 2007 American Wood Fibers, Inc. complaint investigation (facility premise # 01 65 00 0131)

Dear Mr. Roth:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates American Wood Fibers, Inc.'s courtesy and cooperation extended during the July 16, 2007 complaint investigation at your facility located at 2500 Owens Road in Circleville, Ohio. CDO discovered violations of permits-to-install (PTIs) 01-08074 (issued April 25, 2007) and 01-08839 (issued May 11, 2004). Below is a summary of the investigation findings, violations and action items that need to be addressed:

1. **Finding: Pressure Drop Monitoring and Recordkeeping**

An inspection letter from CDO to American Wood Fibers, Inc. dated March 5, 2002 indicated that no baghouse pressure drop records were maintained.

A complaint investigation on June 17, 2006 by CDO at American Wood Fibers, Inc. indicated that no baghouse pressure drop records were maintained.

Conversations with American Wood Fibers, Inc. facility personnel on July 16, 2007 indicate that the pressure drop across the baghouse was monitored by facility personnel but no baghouse pressure drop records were maintained.

Violation:

PTI 01-08074 Section II.C.1 for emissions units P002, P003, P004 and P005 requires:

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

"The permittee shall record the pressure drop across the bag house on a per shift basis."

PTI 01-08839 Section II.C.1 for emissions units P001, P006, P007 and P008 requires:

"The permittee shall record the pressure drop across the bag house on a per shift basis."

Failure to comply with the terms and conditions of the applicable permit-to-install (PTI) is a violation of the terms and conditions of the applicable PTI. Violation of the terms and conditions of a PTI is also a violation of Ohio Revised Code (ORC) §3704.05(C), which states:

"No person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions"

Action Item:

Ohio EPA requests that American Wood Fibers, Inc. immediately implement baghouse pressure drop recordkeeping that complies with the requirements of the applicable permits-to-install.

2. **Finding: **Pressure Drop Deviation Reporting****

No semiannual pressure drop deviation reports have been submitted, since record of baghouse pressure drop are not maintained.

Compliance with pressure drop deviation reporting requirements in PTI 01-08074 Section II.D.1. for emissions units P002, P003, P004 and P005 cannot be determined at this time.

Compliance with pressure drop deviation reporting requirements in PTI 01-08839 Section II.D.1. for emissions units P001, P006, P007 and P008 cannot be determined at this time.

Action Item:

Ohio EPA requests that American Wood Fibers, Inc. report future baghouse pressure drop deviations based upon the records required in Section II.C.1 of the applicable PTI.

3. **Finding: Fugitive Emissions Complaint**

CDO personnel did not witness any fugitive emissions from the facility during this inspection.

The inspector did observe a layer of wood flour covering the blacktop outside the loading area. This material was dry and powdery, and created some airborne dust when CDO and facility personnel walked through it.

Action Item:

CDO and facility personnel discussed good housekeeping practices, including increased cleaning frequencies, in order to minimize fugitive emissions and the complaints associated with them.

Summary:

Be aware, CDO has received five complaints since 2005 that allege operations at American Wood Fibers, Inc. resulted in emissions of fugitive dust. OAC rule 3745-15-07(A) prohibits emissions that may be a public nuisance:

"the emission or escape into the open air from any source or sources whatsoever, of ...dust, dirt, grime, ...or any other substances or combinations of substances, in such manner or in such amounts as to...cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance."

Ohio EPA requests that American Wood Fibers, Inc. refrain from creating conditions that may be considered a public nuisance as required by OAC rule 3745-15-07(A), PTI 01-08074 Section I.A.7 and PTI 01-08839 Section I.A.7.

This complaint investigation also revealed ongoing recordkeeping violations at American Wood Fibers, Inc. The implementation of proper recordkeeping and submittal of deviation reports (if necessary) will resolve these violations.

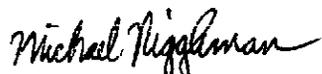
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Ohio EPA requests that American Wood Fibers, Inc. immediately implement baghouse pressure drop recordkeeping as required in PTI 01-08074 and PTI 01-08839 as requested during the complaint investigation on July 16, 2007. After thirty (30) days of records have been accumulated, please provide copies of these records to Ohio EPA for review. Please submit these records within forty-five (45) days of the receipt of this letter.

Please note that the Ohio EPA has the authority to seek civil penalties as provided in section 3704.05 of the ORC. This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If you have any questions, please contact John McGreevy at (614) 728-3818.

Sincerely,



Mike Riggleman
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: John McGreevy, DAPC/CDO
Isaac Robinson, Manager, DAPC/CDO